

EXHIBIT A: Declaration of Valerie Laveus

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Defendants.

Case No. 6:23-cv-00007

**DECLARATION OF ANNE VALERIE DANIEL-LAVEUS
(pursuant to 28 U.S.C. § 1746)**

I, Anne Valerie Daniel-Laveus, upon my personal knowledge, hereby declare as follows:

1. I am a United States citizen who was born in Port au Prince, Haiti, in 1981. I first came to the U.S. at age 18 to attend college as an international student at Slippery Rock University in Pennsylvania. I graduated in 2005 with a Bachelor's Degree in International Business and Spanish.
2. I naturalized as a U.S. citizen in 2008. I currently live in Hollywood, Florida. I have lived here for about 18 years, since 2005.
3. While in Florida, I pursued a Master's Degree in Business Administration with a concentration in Entrepreneurship at Nova Southeastern University in Florida. I worked for

American Express for ten years. However, I realized that my true passion was in education and felt called to become a teacher.

4. I am currently a middle school teacher, and teach technology classes to sixth, seventh, and eighth graders. I have taught other subjects in the past, including intensive reading, business, and speech and debate. I have been a teacher for the past five years.

5. On or around January 17, 2023, I submitted to United States Citizenship and Immigration Services (“USCIS”) a Form I-134A, Online Request to be a Supporter and Declaration of Financial Support, on behalf of my brother, Reginald Daniel, and his 14-year-old son. I am able to sponsor and financially support my brother and nephew for the next two years as required for them to receive travel authorization and seek parole under the recently established parole process for Haitians.

6. I am sponsoring Reginald and his son to seek parole into the United States because I feel responsible for ensuring that my brother and nephew are in as safe and stable conditions as possible. I feel privileged to have made a life for myself here and want them to have the same opportunity as I had. My mother has an approved family-based visa petition for him and his son, but they will have to wait for years for a visa to become available. When the parole program for Haitians started earlier this year, I leapt at the chance to bring them here sooner and faster. My brother has faced significant challenges in Haiti, both due to the country’s deteriorating conditions and as a victim of violence. As his older sister – especially after our dad passed away from colon cancer last year – I feel responsible for looking out for him and my nephew.

7. Reginald is currently 37 years old. He was born in 1985 and currently lives in Port au Prince, Haiti. We speak approximately every 2-3 days. We have become particularly close since our father’s passing last year.

8. Unfortunately, Reginald's life in Haiti has been extremely challenging. In 2015, a police officer shot him in the head at point-blank range. He had been socializing with his friends in a public park near my grandmother's house when a man approached and pointed at my brother, saying, "Here's the guy." Another person, whom my brothers' friends knew was a police officer, pulled out a gun, placed the barrel against his head, and shot him. The gunshot should have immediately killed him, but the bullet ricocheted off his skull and came back out. My brother fell to the ground bleeding.

9. One of the other men in the park knew my grandmother so he stepped in and carried my brother on his back to a private hospital located about a mile away. The hospital did not want to treat him and blocked him at the entrance gate, thinking he did not have the necessary funds, but the man insisted that my father could pay for my brother's care. My father worked in the medical field, in pharmaceuticals. The doctor called my father, realized that he had the resources to pay, and treated Reginald for his gunshot wound. If the hospital had denied him care, I am certain that Reginald would have bled out at the hospital gate.

10. Reginald had a long, difficult recovery. Haiti does not have an equitable or advanced health care system, and it is only through my father's connections with doctors and others in the pharmaceutical industry that Reginald was able to receive medication and follow-up care. He had to have part of his brain removed, and for a time the doctors doubted he would get all his abilities back. For a long time, he suffered epileptic seizures because of brain swelling.

11. After Reginald was shot, my family feared for his life. We immediately moved him away from my grandmother's house, where he had lived before the shooting. For more than two years after that, my family kept my brother inside, away from public spaces, so that he would not receive any further threats while he recovered. Our family did not go to the police after the

shooting because the man who shot him was a police officer. In Haiti, there is little public trust in the police. Our family feared retaliation if we pursued an investigation. In Haiti, it is often better not to stir things up.

12. Amazingly, though, Reginald is now fully functional in every way, and has been since 2021. Despite a long recovery from the shooting, his mind is sharp, he is in very good health, and he is able to work with his hands. I don't anticipate him needing additional medical services once he arrives in the U.S., apart from annual check-ups. I will help him find private insurance.

13. Even though my brother has recovered from the shooting, he has not been able to find steady work because of the deteriorating conditions in Haiti. Before he was shot, he had finished high school and previously worked for Digicel, one of the phone companies in Haiti. He had also done tech support, including working for some time with HaiNet, an internet services company. But there are no good opportunities in Haiti for young men anymore. Gangs target successful people for violence and kidnapping so that they can extort the victims' families for ransom money. I personally know of several people from my old neighborhood who have been kidnapped; some were released, but others have completely disappeared. Entire neighborhoods are now run by gangs that sometimes put a neighborhood on lockdown for days, only letting residents out perhaps once a week so that they can buy food. Haiti is very scary and there's no place to find and hold down a job, or to raise a family.

14. As a result, my mother and I have to send money to Reginald in Haiti every month so that he and his son can survive. It would be better for our family for so many reasons if Reginald and his son were able to come to the United States: we could all be together; my brother could raise his son in a safe place; and Reginald could find work to help support our family.

15. Coming to the United States would also benefit my nephew, Reginald's son, who has likewise faced a lot of instability and danger in his life. After the earthquake in 2010, he moved in with my father and my father's girlfriend because the house where he and Reginald had been living was completely destroyed. He ended up remaining under my father's care after Reginald was shot because Reginald was not able to look after his son during his recovery. My father's girlfriend has continued looking after my nephew since my father's passing. Now that Reginald is fully recovered, we have been trying to transition my nephew back to Reginald's home. However, one of the two schools where my nephew might have been transferred was recently shut down after a student was shot while leaving class. The student who was shot was a bystander, just trying to get an education.

16. Recently, my nephew was also the victim of an attempted kidnapping at his last school. As he was leaving one afternoon, a man on a motorcycle was waiting for him and said that he had been sent to pick him up. My nephew became frightened and ran back into school, where he hid until the man left. He called home and a family member confirmed that they had not sent anyone to get him, so he remained at the school until someone from our family could pick him up much later.

17. As with Reginald, my nephew and I have grown closer since my father's death. Because he lives with my father's girlfriend, I'm not able to speak with him as often as I would like – but I bought him a laptop and phone so we have been able to be in touch more regularly. We are kin. I want to be more involved in raising my nephew to help him have the same opportunities I had. My stepson is leaving for Army training in a few weeks so I will have space at my house for my nephew. I'm looking forward to spending more time with him, helping him get an education, and instilling good values in him.

18. The thing I want most for Reginald and his son is for them to have a normal life. I don't want them to have to worry about whether someone will come after them with a gun. I don't want them to have to live under lockdown, in fear of gangs or kidnappers. I want them to have the same kinds of opportunities I had when I came to the United States as a young person, such as attending college.

19. Accordingly, I helped my mom file a family-based immigrant visa petition for Reginald and his son in 2020 and it was approved in 2021. We have been waiting since then for a visa to become available for him and his son. But all the information available on the USCIS website indicates that we will be waiting for at least six more years. It's just not tenable for Reginald and his son to remain in Haiti for that long – the country is too dangerous and the conditions are too unstable.

20. I learned about the Haiti parole program from an acquaintance. I didn't know at first if it was legitimate, so I contacted a lawyer friend of mine. She told me it was a real program, and that my brother and nephew seemed to qualify, so I immediately looked into filing an application to sponsor them.

21. When I first tried to fill out the application, the website crashed. I decided to gather all of the information I would need first and try again later. I have sufficient savings to support my brother and nephew, in addition to having a steady job as a teacher. I have taught at the same school for five years. I gathered a letter from my bank, a letter from my school, and the other supporting documentation that the program required. It took me about a week to gather all of this information. I ended up applying on January 17, 2023.

22. My mother, a U.S. citizen, lives with me and is thrilled at the prospect of having Reginald and his son finally together with us in the States. She is not in good health, and currently suffers

from diabetes. She used to take blood anticoagulants due to her blood not coagulating correctly. Because travel is difficult for her and she cannot get the medicine for her condition in Haiti, she has not been able to spend much time with my nephew – her grandson – in person, and feels like she has missed out on a lot of his life and personal milestones. She speaks to him on FaceTime and is looking forward to spending a lot of time with him if he is allowed to come to the United States

23. Moreover, my mother suffers from depression, especially since my father's sudden death last year. The possibility of being reunited with her son and grandson has given her a lot of hope. When she learned that I had applied for them under the Haiti parole program, her face lit up in a way that I had not seen in a long time – she seemed like her old self again. I think it will be very good for my mother to have my nephew around.

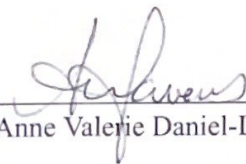
24. I feel certain that Reginald would have real opportunities here to develop a career, earn money to help support our family, and provide a more stable environment for his son. He won't have a language barrier when he gets here because we both learned English while attending an American high school in Haiti. He is very honest, organized, and capable. He is interested in cars and has picked up some skills as a mechanic, so he is considering pursuing training as a mechanic at a technical school. I also have shared information with him about a JavaScript software training program that a friend of mine did; she was able to land a six-figure salary after completing the program. Reginald loves computers so that might be a good option. I also have an uncle in New York who has some leads on jobs for Reginald.

25. My family's hope is that my brother's permanent resident visa comes through while he is here through the parole program so that he does not need to return to Haiti and continue to wait after the two years' parole. Haiti is a very dangerous place right now, and it continues to

deteriorate. It's the worst that I have seen it in my whole life. I just want my brother and nephew to be safe and with the rest of our family and to have access to the same opportunities I had. I am grateful that the parole program for Haitians allows him to be safe and together with us in the United States while he waits for his visa.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct.

Executed at Hollywood, Florida on March 27, 2023.



Anne Valerie Daniel-Laveus